

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

IN RE:)
DEE FORD'S WEST, LLC,) **CHAPTER 11, SUBCHAPTER V**
Debtor.) **CASE NO.: 24-40320**

MOTION TO CONTINUE

COMES NOW the Debtor, Dee Ford's West, LLC, by and through the undersigned counsel, and respectfully requests that the Court continue the upcoming Confirmation Hearing and related Objections. In support thereof, Debtor would state as follows:

1. A Confirmation Hearing and Objections filed by the Trustee and Creditor Thomas Lavigne are currently set for September 26, 2024.
2. Mr. Lavigne is the only creditor in the case. His claim consists of a \$2,000,000 judgment against the Debtor.
3. A Motion for Relief was granted so that Debtor could appeal the judgment to the state Supreme Court.
4. Upon information and belief, a tentative settlement has been reached which may satisfy Mr. Lavigne's claim.
5. Upon information and belief, that settlement has not been finalized, but should be shortly.
6. The terms of said settlement may affect the bankruptcy proceedings.
7. The Bankruptcy Administrator has also filed a Motion to Dismiss which is set for hearing on October 24, 2024.
8. Debtor respectfully requests that the Confirmation Hearing and related Objections be continued until the date of the Bankruptcy Administrator's Motion to Dismiss.

9. Mr. Lavigne, the Bankruptcy Administrator, and the Trustee have all consented to a continuance of these matters.

WHEREFORE, the premises considered, the Debtor pray this Honorable Court will enter an order continuing the hearing on Confirmation and the Objections filed by the Trustee and Mr. Lavigne.

Respectfully submitted this 20th day of September, 2024.

/s/ J. Gabriel Carpenter

J. Gabriel Carpenter
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will serve a copy on the following:

Robert J. Landry, III
Assistant United States Bankruptcy
Administrator
Northern District of Alabama
robert_landry@alnba.uscourts.gov

Linda Baker Gore
Chapter 13 Trustee
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Harry P. Long
Attorney for Thomas Lavigne
P.O. Box 1468
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hlonglegal8@gmail.com

Additionally, I certify that I have served a copy of the foregoing on the creditors listed in the attached Creditor's Matrix.

/s/ J. Gabriel Carpenter

J. Gabriel Carpenter
Attorney for Debtor

Label Matrix for local noticing

1126-1

Case 24-40320-JJR11

NORTHERN DISTRICT OF ALABAMA

Anniston

Fri Sep 20 14:52:25 CDT 2024

Steering Committee

c/o Akin Gump Strauss Hauer & Feld LLP

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Destiny R. Hare

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End of Label Matrix

Mailable recipients 22

Bypassed recipients 2

Total 24